

REMARKS/ARGUMENTS

Solely in order to expedite prosecution, independent claims 21, 25, 27 and 31 have been amended to additionally recite the features recited in claims 23. The Examiner's rejection is traversed below for at least the following reason.

U.S. Patent No. 6,075,942 (*Cartwright, Jr.*) does NOT teach or suggest a reduced-set of virtual machine instructions that includes a push, a load, a store, a dup, a return, and a new instruction (claim 21).

It should be noted that reduced instruction-set represents a complete-set of virtual machine instructions that can be used to implement a virtual machine (claim 23). In other words, the reduced instruction-set is sufficient to implement a virtual machine that can currently be implemented by a conventional Java™ virtual machine instruction-set. Yet the number of instructions in the reduced-set of virtual machine instruction is less than the number of instructions in a conventional Java™ virtual machine instruction-set.

In the Final Office Action, the Examiner has asserted that U.S. Patent No. 6,075,942 (*Cartwright, Jr.*) teaches this feature. To support this assertion, the Examiner has relied on Figures 3 and 5, and the accompanying text described in *Cartwright, Jr.* Clearly, Figure 3 of *Cartwright, Jr.* depicts "a listing of typical virtual machine code generated from [a] source code in a conventional manner," (*Cartwright, Jr.*, brief description of the drawings). Thus, Figure 3 and the accompanying text described in *Cartwright, Jr.* merely depicts virtual machine instructions for a five-line fragment of source code depicted in Figure 1 (*Cartwright, Jr.* col. 2, line 34 to col. 3, line 42). Figure 5 and the accompanying text described in *Cartwright, Jr.* describe a table illustrating the operation of register-oriented machine code generated by the method depicted in Figure 4. Clearly, Figure 5 and the accompanying text do NOT teach or even remotely suggest a reduced virtual machine instruction-set including a push, a load, a store, a dup, a return, and a new instruction. Rather, conventional instructions are merely described. Accordingly, it is respectfully submitted that the Examiner's rejection is improper and should be withdrawn. Moreover, it is respectfully submitted that *Cartwright, Jr.* does NOT teach or suggest a reduced virtual machine instruction-set including a push, a load, a store, a dup, a return, and a new instruction.

Based on the foregoing, it is submitted that all pending claims are patentably distinct over the cited art of record. Additional limitations recited in the independent claims or the dependent claims are not further discussed because the limitations discussed above are sufficient to distinguish the claimed invention from the cited art. Accordingly, Applicant believes that all pending claims are allowable and respectfully requests a Notice of Allowance for this application from the Examiner.

Applicants hereby petition for an extension of time which may be required to maintain the pendency of this case, and any required fee for such extension or any further fee required in connection with the filing of this Amendment is to be charged to Deposit Account No. 500388 (Order No. SUN1P811). Should the Examiner believe that a telephone conference would expedite the prosecution of this application, the undersigned can be reached at the telephone number set out below.

Respectfully submitted,
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